

Exhibit 3

From: [Strong, Bruce](#)
To: [Normand, Sarah \(USANYS\)](#); [Jude, Jennifer \(USANYS\)](#); [Leung, Mona \(USANYS\)](#); [Rapawy, Gregory G.](#); [Shen, Andrew C.](#); [Duffy, Matthew M.](#); [Nitz, Eric](#); [Carter, Sean](#); [Haeefe, Robert](#); [Tarbutton, Joseph](#); [Kry, Robert \(rkry@mololamken.com\)](#); [Steven R. Pounian](#); [Maloney, III, Andrew](#); [Gavin Simpson](#)
Cc: [Goldman, Jerry](#)
Subject: [EXTERNAL] Confidentiality Review of Plaintiffs' Surreply Memorandum of Law -- SUBJECT TO FBI PROTECTIVE ORDER
Date: Monday, May 20, 2024 2:08:25 PM
Attachments: [2024.04.19 - PEC - Surreply to KSA Renewed MTD - Memo of Law \(no. 9706\) highlighted.pdf](#)

All,

Attached please find Plaintiffs' Surreply Memorandum of Law, ECF No. 9706, that was filed under seal in support of Plaintiffs' Opposition to Saudi Arabia's Motion to Dismiss with purported FBI material identified. Plaintiffs continue to review the Declarations of Robert T. Haeefe and James Gavin Simpson and exhibits attached thereto for purported FBI material and will circulate as soon as possible.

Plaintiffs continue to generally reserve the right to object to the FBI's or any other parties' confidentiality designations, including without limitation because (1) the FBI's law enforcement investigation into 9/11 has ended, (2) the public's presumptive right to access judicial documents, especially materials offered for the Court's consideration in dispositive motion practice, (3) President Biden's EO expressing the value of maximizing the public access to this information, (4) the MDL court's prior admonitions as to the need for public access, (5) neither the Government nor any other party has substantiated the necessity for the sealing and proposed redactions and (6) waiver.

Best,

Bruce

Bruce Strong
Shareholder

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